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August 23, 2007

VIA ECF

Hon. William H. Pauley III  
United States District Court  
Southern District of New York  
500 Pearl Street,  
New York, NY 11201

Re: SANCHEZ V. BELLCLAIRE  
Docket No.: 06 cv 1781

Dear Judge Pauley,

The undersigned is counsel to plaintiff in the above-referenced matter. I write to request an extension of time to file plaintiff's motion for collective action certification.

The original dates for the motion are as follows:

8/24/07: Plaintiff shall file its motion;  
9/5/07: Defendant shall file its opposition;  
9/10/07: Plaintiff shall file its reply.

The reason for my request is two-fold: (1) I have had difficulty obtaining affidavits from my client's due to scheduling conflicts, and (2) the date set by the Court to hear oral arguments fall on a Jewish Holiday (the second day of Sukkot).

This is the first request for such relief and my adversary has consented to the adjournment. Attached, please find plaintiff's proposed revised Scheduling Order. The date on which the Court will hear oral argument has been left blank. Due to the Sukkot holiday, I respectfully request that the Court set a hearing date any time after October 5, 2007. I apologize for the late request and I thank the Court very much for Its consideration.

Respectfully submitted,

Justin A. Zeller  
*Counsel to Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LAURO SANCHEZ, et. al.	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	07 Civ. 3429 (WHP)
	:	
BELLCLAIRE, INC., a New York Corporation,	:	Proposed Revised
and KYUNG LEE, individually,	:	<u>Scheduling Order</u>
	:	
Defendants.	:	
-----X		

WILLIAM H. PAULEY III, District Judge:

1. Plaintiffs shall file and serve their motion for collective action certification by September 4, 2007;
2. Defendants shall file and serve their opposition by September 17, 2007;
3. Plaintiffs shall file and serve any reply by September 25, 2007;
4. This Court will hear oral argument on \_\_\_\_\_, 2007 at 11:30 a.m.;
5. All discovery shall be completed by October 31, 2007.
6. The parties shall submit a joint pre-trial order in accordance with this court's individual practices by November 30, 2007; and
7. This Court will hold a final pre-trial conference on December 14, 2007 at 10:00 a.m.

SO ORDERED:

\_\_\_\_\_  
WILLIAM H. PAULEY III  
U.S.D.J.

*Counsel of record:*

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